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7 **ATTORNEY FOR:** Petitioner Zhu

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE**  
10 **NORTHERN MARIANA ISLANDS**

11 ZHU, LIAN KUN ,

12 Petitioner,

13 v.

14 UNITED STATES OF AMERICA,

15 Respondent.

CIVIL CASE NO. 08-0012

CRIMINAL CASE NO. 03-00018

**EX PARTE MOTION  
FOR EXTENSION OF TIME**

16 COMES NOW, Petitioner, ZHU, LIAN KUN, (Mr. Zhu) presently incarcerated in the

17 Bureau of Prisons Moshannon Valley facility located in Philipsburg, Pennsylvania, by and

18 through his Court appointed counsel, Timothy H. Bellas, and respectfully moves *ex parte* for an

1 Order of this Court extending the time for him to comply with the Court's March 3<sup>rd</sup>, 2008 for  
2 an additional Fifteen (15) days.

3 This Motion is based on the attached Declaration of Counsel and the files of this matter and  
4 Criminal Case No. 03-00018.

5 1. This Petition to Vacate, Set Aside or Correct Sentence was filed on February 28<sup>th</sup>,  
6 2008.

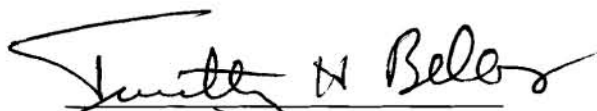
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8 2. On March 3, 2008 the Court *sua sponte* granted a 30 day extension of time for the  
9 Petitioner to submit additional factual support under oath for his Petition.

10 3. This is the first extension of time that Petitioner has requested.

11 4. Counsel has unsuccessfully attempted to contact the Petitioner on several occasions  
12 to confer regarding the progress of his efforts to obtain such factual support, as more fully detailed  
13 in the attached Declaration of the Timothy H. Bellas.  
14

15 Wherefore, counsel would respectfully request that the date to submit the factual support  
16 mandated by the March 3<sup>rd</sup> Order of this Court be extended from April 3<sup>rd</sup> to April 18<sup>th</sup>, 2008.

17 Respectfully submitted, this 2<sup>nd</sup> day of April, 2008.  
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21 Timothy H. Bellas, F-0135  
22 Attorney for Petitioner Zhu  
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